

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:)	
JULIE A. FISH,)	Case No. 14-41200-705
Debtor,)	Chapter 7
)	
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MS. E. REBECCA CASE,)	Debtor's Answer and Response to the
Movant/Chapter 7 Trustee,)	Chapter 7 Trustee's Third Motion for
vs.)	Extension of Time for Filing Objection to
JULIE A. FISH,)	Discharge and/or Complaint to Determine
Respondent/ Debtor,)	Dischargeability of Debt and/or to Dismiss
)	Case.

**DEBTOR'S ANSWER AND RESPONSE TO THE CHAPTER 7 TRUSTEE'S
THIRD MOTION FOR EXTENSION OF TIME FOR FILING OBJECTION
TO DISCHARGE AND/OR COMPLAINT TO DETERMINE
DISCHARGEABILITY OF DEBT AND/OR TO DISMISS CASE**

Comes Now, Julie A. Fish, Respondent/Debtor, by and through her attorney, Steven C. Bublitz, and for the Debtor's Answer and Response to the Chapter 7 Trustee's Third Motion for Extension of Time for Filing Objection to Discharge and/or Complaint to Determine Dischargeability of Debt and/or to Dismiss Case and states as follows:

1.) Debtor admits the allegations contained in paragraphs numbered 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 22, 23, 26, 27, and 28 of the Movant's Third Motion for Extension.

2.) Debtor denies each and every allegation contained in paragraphs numbered 9, 12, 21, 24, 25, 29, 31, 32, 33, and 34 of the Movant's Third Motion for Extension.

3.) Debtor further states that Debtor has provided the Chapter 7 Trustee with extensive records in a prompt and timely fashion namely:

- (A.) Debtor's 2011, 2012 and 2013 Federal and State of Missouri Income Tax Returns
- (B.) Any and all recorded documents from the St. Louis County Recorder of Deed relative the Debtor's ownership interest, any debt secured against her residence including

applicable tax liens and any conveyances from Debtor's former spouse to her.
(C.) Debtor's Separation Agreement and Decree of Dissolution of Marriage.
(D.) Declaration Page and Copy of Debtor's Homeowner's Insurance Policy with proof
of all levels of coverage including any personal property riders.
(E.) Payroll Report for twelve months from Nomad Adventures LLC to verify any and all
salary or wages paid by Nomad Adventures LLC to Debtor.
(F.) Any documents in the Debtor's possession relative to Celebrity Cruises deposits.
(G.) Copies of incorporating documents for Nomad Adventures LLC
(H.) Copies of twelve months of Bank Statements for any and all bank accounts for
Debtor.
(I.) Any documents with the last know address for Susan Damon the other 50% owner of
Nomad Adventures LLC.

4.) That on October 14, 2014 at 1:30 PM the Debtor, Julie Fish, appeared at the 6th
Floor Meeting of the Office of the US Trustee and answered any and all questions that Ms.
Janice Valdez, Attorney for Chapter 7 Trustee, and Mr. Peter Lumaghi, Attorney of Office of US
Trustee had for Debtor and in fact the Debtor testified for over three hours and at no time during
that 341 Meeting of Creditors did the Debtor refuse to answer any questions posed by the
attorney for Chapter 7 Trustee, Ms. Valdez, or Mr. Lumaghi, attorney for US Trustee.

5.) That the Debtor and her counsel were advised by Ms. Valdez, attorney for
Chapter 7 Trustee E. Rebecca Case, that the 341 Meeting of Creditors would be closed after
Debtor's testimony on October 14, 2014.

6.) That Debtor has testified on October 14, 2014 and at her previous four (4) 341
Meetings of Creditors that she does not have certain documents Chapter 7 Trustee has requested
namely as follows:

- (A.) Corporate Books and records for Nomad Adventures LLC.
- (B.) Nomad Adventures LLC corporate income tax return for 2013.

7.) That Debtor and her counsel prepared lengthy and numerous amendments to
Schedules A, B, C, D and Statement of Financial Affairs at the special request and **demand** of
the Chapter 7 Trustee and the Chapter 7 Trustee previously extensively interviewed and

interrogated Debtor, Julie Fish, regarding the contents of these amendments on July 18, 2014.

8.) That it is not the Chapter 7 Trustee's mandate and role to be involved in any adversary action between Debtor and Southwest Bank with respect to Complaint to Determine Dischargeability of Debt and Southwest Bank is very well represented by attorney's from Cooper & Scully and that the adversary complaint is not going to produce any assets for the Chapter 7 Trustee to administer upon.

9.) Debtor does not have any other credit card statements in her possession that have not already been turned over to the Chapter 7 Trustee more than ninety (90) days ago.

10.) That since October 14, 2014 341 Meeting of Creditors the Chapter 7 Trustee, Attorney for Chapter 7 Trustee, and the Attorney for Office of US Trustee have not made any new request for documents or records other than records the Debtor does not have in her possession.

WHEREFORE, Respondent/Debtor prays this honorable court enter an order **Denying** the Chapter 7 Trustee's Attorney's Third Motion for Extension of Time for Filing Objection to Discharge and/or Complaint to Determine Dischargeability of Debt and/or Motion to Dismiss Case and in the alternative to set a final date for the Chapter 7 Trustee to File Objection to Discharge and/or Complaint to Determine Dischargeability of Debt and/or Motion to Dismiss Case and for such other and further orders as this honorable court deems just and proper.

Respectfully Submitted,

/s/ Steven C. Bublit

Mr. Steven C. Bublit MBE 38247

Attorney for Respondent/Debtor, Julie Fish

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Certificate of Service

A copy of the above and foregoing pleading was sent to the Ms. Janice Valdez, Attorney for Chapter 7 Trustee E. Rebecca Case, 7733 Forsythe Blvd, Suite 500, St. Louis, Missouri 63105, Ms. Lauren Tow, Attorney for Southwest Bank, Cooper & Scully P.C., 900 Jackson Street, Suite 100, Dallas, Texas 75202 and Office of US Trustee, 111 South Tenth Street, Suite 6353, St. Louis, Missouri 63102 by electronic noticing through the US Bankruptcy Court ECF System and by depositing a copy in the U.S. Mail, First Class Postage Prepaid on this 18th day of November, 2014 so certifies the undersigned.

/s/ Steven C. Bublit